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February 14, 2013

Via Electronic Comment Filing System

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

Re:

Millry Communication, Inc. d/b/a Millry Long Distance's Annual 47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI) Compliance

Certification

EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Millry Communication, Inc. d/b/a Millry Long Distance ("Millry Communication"), please find attached the annual CPNI Compliance Certification for Millry Communication for the year 2012 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

Attorney for Millry Communication, Inc. d/b/a Millry

Jane H. Bellingslung

Long Distance

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Enclosure

cc: Bobby Williams

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 14, 2013

Name of company covered by this certification: Millry Communication, Inc. d/b/a Millry Long Distance

Form 499 Filer ID: 819156

Name of signatory: Bobby Williams

Title of signatory: Vice President

In response to the Federal Communications Commission's ("Commission") rules and policies, Millry Communication, Inc. d/b/a Millry Long Distance states as follows:

I, Bobby Williams, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Supplied Signed Supplied Supplie

Before the Federal Communications Commission Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF MILLRY COMMUNICATION, INC. D/B/A MILLRY LONG DISTANCE

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Millry Communication, Inc. d/b/a Millry Long Distance (hereinafter "Millry Communication") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, et seq. on behalf of Millry Communication:

- 1. I have personal knowledge that Millry Communication has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that Millry Communication obtains written approval for the use of its customers' CPNI and that Millry Communication has notified its customers of their right to restrict Millry Communication's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that Millry Communication has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Millry Communication has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, et seq., and that Millry Communication has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that Millry Communication implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that Millry Communication maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Millry Communication retains all such records for a minimum period of one (1) year.

- I have personal knowledge that Millry Communication has established a supervisory review process regarding Millry Communication's compliance with outbound marketing situations and that Millry Communication maintains records of such compliance for a minimum period of one (1) year. Millry Communication's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- 7. I have personal knowledge that Millry Communication has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Millry Communication, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Millry Communication to enforcement action.

Executed on this _____ day of February, 2013.

MILLRY COMMUNICATION, INC. D/B/A MILLRY LONG DISTANCE

Printed: Bobby Williams

As Its: Vice-President